

FILED

June 15, 2022

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: SAJ
Deputy

Case No: SA:22-CR-00304-XR

UNITED STATES OF AMERICA

Plaintiff

v

SEAN AARON SMITH

Defendant

INDICTMENT

**COUNT 1: 18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm**

**COUNT 2: 18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm**

THE GRAND JURY CHARGES:

**COUNT ONE
[18 U.S.C. §922(g)(1)]**

That on or about May 13, 2022, in the Western District of Texas, Defendant

SEAN AARON SMITH,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: polymer80, Inc. PFC9; serial number CA15357; and said firearm had been shipped and transported in interstate and foreign commerce in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO
[18 U.S.C. § 922(g)(1)]**

That on or about May 15, 2022, in the Western District of Texas, Defendant

SEAN AARON SMITH,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: Sig Sauer pistol, serial number

66B430849, and an AK-47 GP/WASR-10/63, serial number 1968B11180; and said firearms had each been shipped and transported in interstate and foreign commerce in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF UNITED STATES OF AMERICA’S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Firearm Violations and Forfeiture Statutes

**[Title 18 U.S.C. § 922(g)(1), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1),
made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]**

As a result of the criminal violations set forth in Counts One and Two, the United States gives notice to Defendant **SEAN AARON SMITH** of its intent to seek the forfeiture of the properties described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

Title 18 U.S.C. § 924. Penalties

(d)(I) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

This Notice of Demand for Forfeiture includes but is not limited to the following:

1. polymer80, Inc. PFC9; serial number CA15357
2. Sig Sauer pistol, serial number 66B430849;
3. AK-47 GP/WASR-10/63, serial number 1968B11180; and

4. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

A TRUE BILL

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF
UNITED STATES ATTORNEY

BY:



FOR MARK ROOMBERG
Assistant United States Attorney



FOR MATTHEW W. KINSKEY
Assistant United States Attorney